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*"Fighting Blindness"*

P.O. Box 900, Woodland Hills, CA 91365 - 1 (800) FIGHT RP

August 19, 1997

Office of the Secretary  
 Federal Communications Commission  
 1919 M Street, N.W.  
 Washington, DC 20554

Before the  
 Federal Communications Commission  
 Washington, D.C. 20554

In the Matter of  
 Annual Assessment of the Status of  
 Competition in Markets for the  
 Delivery of Video Programming

CS Docket No. 97-141

REPLY COMMENTS  
 of  
 Helen Harris  
 President & Founder  
 RP International & TheatreVision  
 P.O. Box 900  
 Woodland Hills, CA 91365

I, Helen Harris, am pleased to file these Reply Comments on August 18, 1997 regarding video description for the blind and vision impaired.

Although the member companies of the MPAA pledge increased video description, they insist that the added volume of description wait until high definition television is securely in place. There are many opportunities for more description, but the major networks and cable suppliers seem to invent roadblocks.

Example: TheatreVision proposed to a major cable/production company that their major specials and movies be described. In spite of the fact that they have the SAP channel in place and operating, they refused because they use their SAP facilities for Spanish language. (See letter attachment.)

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Did they offer to share the SAP channel with the blind? No. Did they shut out the blind and vision impaired? Yes.

Another example: One of the major broadcast networks had a classic holiday movie scheduled. Since TheatreVision was describing for television two other movies for the distributor of that film, we suggested that we describe this special film as well. With written permission from the distributor, we approached the broadcast network. Very quickly, a contract was sent to the TheatreVision office, inviting us to describe this film for the vision impaired. The very next day another letter arrived from the same network saying "Oops!" "We cannot initiate use of the SAP channel on this network. It would cost us millions of dollars." With those terse words, we were denied the opportunity to describe that program on that network. Subsequent investigation showed that network above the other broadcast networks had a dozen major cities in place with SAP facilities, yet even for the blind in those dozen major cities, they could not and would not initiate the SAP channel.

Throughout your report, the contributing commentators cite the huge expense of installing SAP facilities. We challenge the million dollar cost per station that has been quoted in some of your documents, but just take example the revenue generated from cable. If a subscriber pays \$60 a month for cable service, that equals over \$700 a year. Our figures show that there are 30 million people who can avail themselves of description. If those 30 million would subscribe, that would be \$21 billion dollars additional revenue. Cut that in half, and it's \$10 billion dollars. Cut that in half again, and it's still \$5 billion dollars additional revenue that the vision impaired could contribute to the income of someone participating in description.

Some of the figures quote eight million people needing description, but those figures do not include the dyslexic, the attention deficit, the elderly and the many, many in nursing homes. Those are additional members of that invisible community called the vision impaired. At this point, it should be pointed out that there are more than two national suppliers of video description. TheatreVision has been in existence for the past four years, creating description initially in motion picture theaters with major motion pictures in today's environment and with today's technology. The vision impaired who attend the motion picture theaters attend with accessibility equal to their sighted peers. They are not relegated to a Sunday afternoon television "ghetto"--the only time they can see the film at a certain time on a Sunday matinee on television. TheatreVision allows the vision impaired to

go out and enjoy that "let's go to the movies" experience along with their sighted friends and family.

TheatreVision has been obtaining its own funding, and has been expanding into television and live broadcasting including descriptions of the Academy Awards three years in a row, and description of the Garth Brooks concert in Central Park, as well as four feature motion pictures on commercial television. We are seeking greater cooperation from both cable and broadcast television today, now, not to wait for that undefined distant time period when high definition television is in place.

We agree with the comments of the National Coalition of Blind and Visually Impaired Persons for Increased Programming Accessibility that live description is not nearly as good as planned, written description. When we described the Garth Brooks concert, we, of necessity, had to describe it live; and it does not allow for as much preparation nor as thorough a description necessary for the visually impaired.

When preparing the hardware for future description, one should note that menus on the screen are not a great help to the visually impaired. All menus should talk. Also the SAP button or any access button for other audio channels should be Brailled. There should be some touch identification of those buttons.

In conclusion, when we who are involved in description see the funding that is available to captioning, we regret that efforts to support description for the vision impaired were not organized and pushed earlier and with much more force. The blind do not want to be shut out of normal opportunities and accessibility. We recommend that mandating of description in broadcast television and in cable be initiated as soon as possible.

Sincerely,

*Helen Harris*

Helen Harris  
President and Founder

HH:ag



Robert M. Zitter  
Senior Vice President  
Technology Operations

2/21/1997

March 5, 1996

Mr. Jim Gates  
TheatreVision  
Post Office Box 900  
Woodland Hills, CA 91365-0900

Dear Mr. Gates:

Thank you for the information you provided in response to my questions.

At this time unfortunately HBO is not able to provide video descriptions as part of our service.

As you indicated, we would need to use the Second Audio Program feature of the MTS stereo technology to provide video descriptions to cable subscribers receiving HBO. As you know, there is only one SAP channel and HBO uses it to deliver our Spanish language service, HBO en Español, to subscribers. We have been serving the Spanish speaking segment of our audience in this manner for several years and HBO en Español has been enthusiastically received.

As long as the cable TV infrastructure to deliver our service remains analog, there is no technical means by which we can deliver a 4th audio channel to subscribers. If this situation changes appreciably in the future, we will re-examine the possibility of providing video descriptions.

Sincerely,

RMZ:mb

cc:	John Billock	HBO
	Helen Harris	TheatreVision
	John Redpath	HBO